

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

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UNITED STATES OF AMERICA

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIV. COLUMBUS

VS. : CASE NO.
SHANE M. MAUGER JUDGE

2 : 16 cr 091

GOVERNMENT'S PLEA AGREEMENT SUBMISSION
OF ELEMENTS AND PENALTIES FOR
18 U.S.C. § 241 AND 18 U.S.C. § 666(a)(1)(A)

Judge Marbley

COUNT 1

1. ELEMENTS: 18 U.S.C. § 241

First: That the defendant knowingly agreed with another person to injure or oppress one or more third parties in the exercise of a right guaranteed by the Constitution of the United States;

Second: That the defendant specifically intended to interfere with the federal right in question; and

Third: That the agreement or at least one act of the conspiracy took place in the Southern District of Ohio.

2. PENALTIES

A. Mandatory Minimum: None.

B. Possible Maximum: 10 years' imprisonment, a fine of \$250,000, 3 years supervised release, and \$100 special assessment.

COUNT 2

3. ELEMENTS: 18 U.S.C. § 666(a)(1)(A)

First: That, at the times alleged in the Information, the defendant was an agent of an agency of a local government —namely, the Reynoldsburg Division of Police;

Second: That, in a one-year period, the Reynoldsburg Division of Police and the City of Reynoldsburg each received federal benefits in excess of \$10,000;

Third: That the defendant stole property, obtained property by fraud, or without authority knowingly converted property to the use of a person other than its rightful owner;

Fourth: That the property stolen, obtained by fraud, or knowingly converted was in the care, custody, or control of the Reynoldsburg Division of Police;

Fifth: That the value of the property stolen, obtained by fraud, or knowingly converted was at least \$5,000; and

Sixth: That an essential element of the offense occurred in the Southern District of Ohio.

4. PENALTIES

A. Mandatory Minimum: None.

B. Possible Maximum: 10 years' imprisonment, a fine of \$250,000, 3 years supervised release, and \$100 special assessment.

Respectfully submitted,

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